

LOMBARDI, LOPER & CONANT, LLP  
Lake Merritt Plaza  
1999 Harrison Street, Suite 2600  
Oakland, CA 94612-3541

JOHN W. RANUCCI, State Bar No. 184801  
jwr@llcllp.com  
LIZA SIU MENDOZA, State Bar No. 242493  
lsm@llcllp.com  
LOMBARDI, LOPER & CONANT, LLP  
Lake Merritt Plaza  
1999 Harrison Street, Suite 2600  
Oakland, CA 94612-3541  
Telephone: (510) 433-2600  
Facsimile: (510) 433-2699

Attorneys for Defendant  
THE HERTZ CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

KATHLEEN M. LUCAS and DAN  
MARTIN,

Plaintiffs,

v.

HERTZ CORPORATION and DOES 1-10,  
inclusive,

Defendants.

Case No. 4:11-cv-01581 LB

**STIPULATION TO MODIFY CASE  
MANAGEMENT AND PRE-TRIAL  
ORDER; ~~PROPOSED~~ ORDER**

WHEREAS all parties herein acted, and continue to act, diligently in conducting discovery, the parties stipulate to extend deadlines prescribed by the Case Management and Pretrial Order.

Good cause exists for the extension of deadlines due to plaintiffs' delay in service of their FRCP 26 Initial Disclosure. The FRCP 26 Initial Disclosures were originally due on August 25, 2011. Plaintiffs sought to extend the deadline to September 26, 2011. Plaintiffs then sought another extension to November 1, 2011. These extensions were necessitated by plaintiff Dan Martin's medical status. Due to a calendaring omission, plaintiffs failed to serve their Initial Disclosure on November 1, 2012 and are still in the process of preparing the disclosure.

It was also agreed by the parties that in an effort to comply with the Court-ordered mediation deadline of February 2, 2012, plaintiffs would informally provide defendant with information relating to plaintiff Martin's pre-existing quadriceps injury. Plaintiffs have not yet been able to provide defendant with the requested information. Because defendant believes this information is critical to the issue of liability, defendant is not in a position to meaningfully participate in mediation.

In the interests of avoiding prejudice to defendant by not having received plaintiffs' Initial Disclosure and also with the objective of making the mediation a meaningful process, the parties have agree to modify dates and deadlines as follows:

Case Event	Original Date	Revised Date
ADR Completion Date	2/2/12	4/2/12
Non Expert Discovery Completion Date	8/31/12	10/15/12
Expert Discovery Completion Date	10/4/12	10/31/12

Dated: December 1, 2011

ROUDA, FEDER, TIETJEN & MCGUINN

By: /s/ Cynthia McGuinn  
Cynthia McGuinn  
Miles B. Cooper  
Attorneys for Plaintiffs KATHLEEN  
LUCAS and DAN MARTIN

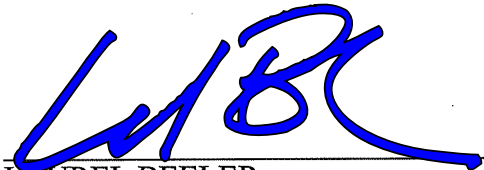
Dated: December 1, 2011

LOMBARDI, LOPER & CONANT, LLP

By: /s/ John W. Ranucci  
John W. Ranucci  
Liza Siu Mendoza  
Attorneys for Defendant  
THE HERTZ CORPORATION

IT IS SO ORDERED.

Dated: December 2, 2011

  
LAUREL BEELER  
United States Magistrate Judge